## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

ANA R. OLIVELLA RIVERA \* CIVIL NO.: 98-2267 (JAG)

Plaintiff

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\* JURY TRIAL DEMANDED

POPULAR LEASING AND RENTAL, INC., ET AL.

\*

\*

<u>Defendants</u> \*

## MOTION REQUESTING ADDITIONAL TIME TO FILE REPLY

## TO THE HONORABLE COURT:

V.

COME NOW defendants PREFERRED RISK INSURANCE COMPANY (erroneously denominated Puerto Rican American Insurance Company) and BANCO POPULAR DE PUERTO RICO, represented by the undersigned attorneys, and before the Honorable Court respectfully tenders this proposed pre-trial order:

- 1. As stated in our previous motion requesting extension to file reply, due to health reasons the undersigned attorney has been mostly out of the office for the past two (2) weeks. In addition, she will be out of Puerto Rico until April 23, 2006. For that reason, an additional short extension of time is needed up until April 28, 2006 in order to be able to file an opposition to plaintiff's reply to the undersigned's motion for summary judgment.
- 2. As stated in our previous motion, on April 4, 2006 plaintiffs filed an amendment to its motion including new exhibits which had not been previously submitted through discovery. The

appearing party needs the requested extension in order to examine those documents and investigate plaintiff's allegations.

WHEREFORE, an additional extension of time is needed until April 28, 2006 in order for the appearing party to file its reply to plaintiff's opposition to motion for summary judgment.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Rafael A. Oliveras López, Esq., and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: David López Pumarejo, Esq., P.O. Box 195351, San Juan, Puerto Rico 00919-5351.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 19th day, of April, 2006.

s/ Ana María Otero
USDC No. 206312
Attorney for defendants
Preferred Risk Insurance Company
and Banco Popular de Puerto Rico
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